

# EXHIBIT A

SMALL CLAIMS SUMMONS AND RETURN OF SERVICE - PAGE 2

Plaintiff or Plaintiff's Attorney Information:

Name: Thomas J. Major, Esq.  
Address: 574 Newark Ave., Ste 301  
Jersey City, NJ 07306  
Phone: 2014740470

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION, SPECIAL CIVIL PART  
Hudson ☒ COUNTY



Mohammad Babar

FEB 1 2014

SPECIAL CIVIL PART

versus  
Screening Reports, Inc.

Docket Number: SC-252-14  
(to be provided by the court)

Defendant(s)

Defendant Information:

Name: JOSEPH S. MECKEL (REGISTERED AGENT)  
Address: 166 W. Washington, Suite 300  
Chicago, IL 60602  
Phone: \_\_\_\_\_

Civil Action  
SUMMONS

(Check one): ☐ Contract ☒ Tort

Demand Amount:	\$	1,000.00
Filing Fee:	\$	15.00
Service Fee:	\$	7.00
Attorney's Fees:	\$	
TOTAL:	\$	1,022.00

YOU MUST APPEAR IN COURT ON THIS DATE MAR - 7 2014 AND TIME 10 ☒ a.m. ☐ p.m.  
OR THE COURT MAY RULE AGAINST YOU.

REPORT TO: \_\_\_\_\_ Hon. Lourdes Santiago, JSC

RETURN OF SERVICE  
583 Newark Ave  
B-4

Date Served: \_\_\_\_\_ Jersey City, New Jersey 07306

RETURN OF SERV.

Docket Number \_\_\_\_\_  
Date: \_\_\_\_\_ Time: \_\_\_\_\_ WM \_\_\_\_\_ WF \_\_\_\_\_ BM \_\_\_\_\_ BF \_\_\_\_\_ OTHER \_\_\_\_\_  
HT \_\_\_\_\_ WT \_\_\_\_\_ AGE \_\_\_\_\_ HAIR \_\_\_\_\_ MUSTACHE \_\_\_\_\_ BEARD \_\_\_\_\_ GLASSES \_\_\_\_\_  
NAME: \_\_\_\_\_ RELATIONSHIP: \_\_\_\_\_  
Description of Premises \_\_\_\_\_

I hereby certify the above to be true and accurate:

\_\_\_\_\_  
Special Civil Part Officer

SMALL CLAIMS SUMMONS AND RETURN OF SERVICE



THE SUPERIOR COURT OF NEW JERSEY

Law Division, Special Civil Part

SMALL CLAIMS SUMMONS

**YOU ARE BEING SUED!**

**IF YOU WANT THE COURT TO HEAR YOUR SIDE OF THIS CASE, YOU MUST APPEAR IN COURT. IF YOU DO NOT, THE COURT MAY RULE AGAINST YOU. READ ALL OF THIS PAGE AND THE NEXT PAGE FOR DETAILS.**

In the attached complaint, the person suing you (who is called *the plaintiff*) briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. **You are cautioned that if you do not come to court on the trial date to answer the complaint, you may lose the case automatically**, and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment and the judgment is valid for 20 years.

You can do one or more of the following things:

1. *Come to court to answer the complaint.* You do not have to file a written answer, but if you dispute the complaint and want the court to hear your side of the case, you must appear in court on the date and at the time noted on the next page.

AND/OR

2. *Resolve the dispute.* You may wish to contact the plaintiff's lawyer, or the plaintiff if the plaintiff does not have a lawyer, to resolve this dispute. **You do not have to do this unless you want to.** This may avoid the entry of a judgment and the plaintiff may agree to accept payment arrangements, which is something that cannot be forced by the court. You will have to appear in court on the trial date unless a written agreement is reached and filed with the court.

AND/OR

3. *Get a lawyer.* If you cannot afford to pay for a lawyer, free legal advice may be available by contacting Legal Services at 201-792-6363. If you can afford to pay a lawyer but do not know one, you may call the Lawyer Referral Services of your local county Bar Association at 201-798-2727.

If you need an interpreter or an accommodation for a disability, you must notify the court immediately.

**La traducción al español se encuentra al dorso de esta página.**

\_\_\_\_\_  
Clerk of the Special Civil Part

NOTIFICACIÓN DE DEMANDA EN RECLAMACIÓN DE MENOR CUANTÍA Y  
CONSTANCIA DE EMPLAZAMIENTO



EL TRIBUNAL SUPERIOR DE NUEVA JERSEY  
División de Derecho, Parte Civil Especial  
NOTIFICACIÓN DE DEMANDA RECLAMACIÓN DE MENOR CUANTÍA

¡LE ESTÁN DEMANDANDO!

SI USTED QUIERE QUE EL TRIBUNAL VEA SU VERSIÓN DE ESTA CAUSA TIENE QUE COMPARECER EN EL TRIBUNAL. SI NO COMPARECE, EL TRIBUNAL PODRÍA DECIDIR EN SU CONTRA. PARA LOS DETALLES, LEA TODA ESTA PÁGINA Y LA QUE SIGUE.

En la demanda adjunta, la persona que le está haciendo juicio (que se llama *el demandante*) da al juez su versión breve de los hechos del caso y la suma de dinero que alega que usted le debe. Se le advierte que si usted no viene al tribunal en la fecha del juicio para contestar la demanda, es posible que pierda la causa automáticamente y el tribunal puede dar al demandante lo que pide más intereses y costas judiciales. Si se asienta una decisión en contra de usted, un Oficial de la Parte Civil Especial (Special Civil Part Officer) puede embargar su dinero, salario o bienes muebles para pagar toda la adjudicación o parte de ella, y la adjudicación permanece vigente durante 20 años.

Usted puede escoger entre las siguientes cosas y optar por una o más de una:

1. *Venir al tribunal para contestar la demanda.* No hace falta que presente una contestación por escrito, pero si usted disputa la demanda y quiere que el juez vea su versión de la causa, tiene que comparecer en el tribunal en la fecha y a la hora indicadas en la página que sigue.

ADEMÁS, O EN VEZ DE ELLO, USTED PUEDE

2. *Resolver la disputa.* Usted posiblemente quiera comunicarse con el abogado del demandante, o con el demandante mismo, si el demandante no tiene abogado, para resolver esta disputa. No está obligado a hacerlo si no quiere. Una resolución puede evitar que se asiente una adjudicación en su contra y el demandante podría estar de acuerdo con aceptar un convenio para que se le hagan los pagos -- lo cual es algo que el juez no puede imponer. Tendrá que comparecer en el tribunal en la fecha del juicio a menos que se llegue a un acuerdo por escrito que se registra en el tribunal.

ADEMÁS, O EN VEZ DE ELLO, USTED PUEDE

3. *Conseguir un abogado.* Si usted no tiene dinero para pagar a un abogado, es posible que pueda recibir consejos legales gratuitos si se comunica con la oficina de Servicios Legales (Legal Services) al \_\_\_\_\_. Si tiene dinero para pagar un abogado, pero no conoce ninguno, puede llamar a Servicios de Recomendación de Abogados (Lawyer Referral Services) del Colegio de Abogados (Bar Association) de su condado local al \_\_\_\_\_.

Si necesita un intérprete o algún arreglo por una discapacidad, tiene que notificárselo inmediatamente al tribunal.

\_\_\_\_\_  
Secretario de la Parte Civil Especial

Thomas J. Major, Esq.  
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(201) 822-6177 (f)  
tmajor@tmajorlaw.com  
Attorney for Plaintiff Mohammad Babar

MOHAMMAD BABAR,  Plaintiff,  v.  SCREENING REPORTS, INC.,  Defendant.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION, SPECIAL CIVIL PART HUDSON COUNTY  DOCKET NO.  Civil Action  COMPLAINT
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Plaintiff MOHAMMAD BABAR by way of Complaint against Defendant  
SCREENING REPORTS, INC. alleges as follows:

#### NATURE OF THE ACTION

1. This is a civil action for money damages stemming from Defendant's violation of the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.

#### PARTIES

2. Plaintiff Mohammad Babar is a resident of Piscataway Township, New Jersey.
3. Defendant Screening Reports, Inc. is an Illinois Corporation with principal place of business at 220 Gerry Drive in Wood Dale, Illinois 60191.
4. Defendant's registered agent is Joseph S. Messer located at 166 W Washington, Suite 300 in Chicago, Illinois 60602.

#### JURISDICTION & VENUE

5. Defendant Screening Reports, Inc. is subject to the jurisdiction of this Court by virtue its commission of tortious acts within Hudson County, New Jersey.
6. As a national vendor of background screening services for residential landlords, venue is appropriate due to Defendant's business transactions in Hudson County, New Jersey.

#### FACTUAL ALLEGATIONS

7. In 2011, while Plaintiff was a resident of Jersey City, New Jersey, he was the defendant in a landlord/tenant action captioned as Empire Properties v. Babar with docket no. HUD-LT-18335-11 ("2011 landlord/tenant action").
8. The action was dismissed as the parties reached a settlement.
9. On or about October 15, 2012, Plaintiff's rental application to the Carlton Club Apartments in Piscataway Township was rejected due to an "eviction record match."
10. In making their determination to reject Plaintiff's rental application, the Carlton Club Apartments relied on a credit report supplied by Defendant.
11. In Defendant's credit report, the 2011 landlord/tenant action was listed as an eviction.

12. As the 2011 landlord/tenant action was settled between the parties, Plaintiff was never evicted.
13. Further, the plaintiff in the 2011 landlord/tenant action never applied for a Warrant of Removal.
14. Thus, 2011 landlord/tenant action was clearly mis-labeled as an "eviction."
15. On or about January 23, 2013, Plaintiff's counsel sent a letter to Defendant requesting the correction of Plaintiff's credit report.
16. Defendant did not correct Plaintiff's credit report.
17. A subsequent rental application by Plaintiff was rejected on the basis of Defendant's erroneous categorization of the 2011 landlord/tenant action.

COUNT I

DEFENDANT'S VIOLATION OF THE FAIR CREDIT REPORTING ACT, 15  
U.S.C. § 1681 ET SEQ.

18. Plaintiff repeats and re-alleges the allegations set forth above as though completely set forth herein.
19. The Fair Credit Reporting Act requires that reporting agencies "follow reasonable procedures to assure maximum possible accuracy of the information." 15 U.S.C. § 1681e(b).
20. Defendant's failure to correct Plaintiff's credit report after being notified of its error is a willful violation of the Fair Credit Reporting Act.



WHEREFORE, Plaintiff demands judgment on Count I of the Complaint for damages of \$1,000.00, for punitive damages as the Court may allow pursuant 15 U.S.C. § 1681m(a)(1)(A), for mandatory attorney's fees and costs under 15 U.S.C. § 1681m(a)(3), and for other further relief as the Court deems just.

**DESIGNATION OF TRIAL COUNSEL**

Thomas J. Major, Esq. is hereby designated as trial counsel for the Plaintiff in this Matter.

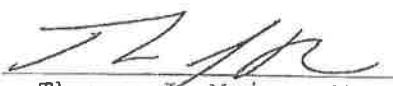
**CERTIFICATION PURSUANT TO RULE 4:6-1**

I certify that this pleading has been filed and served within the time prescribed by the Rules of Court.

**CERTIFICATION**

I certify that the matter in controversy is not the subject of any other actions or arbitration proceeding, now, pending or contemplated, and that no other parties should be joined in this action.

Thomas J. Major, Esq.  
Attorney for Plaintiff

By:   
Thomas J. Major, Esq.

Dated: 2/10/14



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Attorney for Plaintiff Mohammad Babar

MOHAMMAD BABAR,	SUPERIOR COURT OF NEW JERSEY
Plaintiff,	LAW DIVISION, SPECIAL CIVIL PART
	HUDSON COUNTY
v.	DOCKET NO.
SCREENING REPORTS, INC.,	Civil Action
Defendant.	CERTIFICATION OF DILIGENT INQUIRY

Thomas J. Major, Esq., of full age, hereby certifies as follows:

1. I am an attorney licensed to practice law in the State of New Jersey and represent the Plaintiff in the above-captioned matter.
2. As such, I am fully familiar with the facts of this case and make this Certification on personal knowledge.
3. I made a diligent search of Defendant's present location and find that Defendant cannot be served within the State of New Jersey.
4. Defendant is a company engaged in the business of providing rental background search services to residential landlords and maintains a principal place of business in Wood Dale, Illinois.
5. A corporation search with the Illinois Secretary of State reveals that Defendant's registered agent is: Joseph S. Messer, 166 W Washington, Suite 300, Chicago, IL 60602.
6. A search with the Division of Revenue and Enterprise Services revealed that Defendant is not registered with the State of New Jersey.

7. A further search the Division of Revenue and Enterprise Services did not reveal any records within the State of New Jersey for Better NOI, a d/b/a name associated with Defendant.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

  
Thomas J. Major, Esq.

Dated: 2/10/14